



Memo Endorsed

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By ECF

Application Granted
(as edited)

SO ORDERED:

Date: 6/28/25 Richard M. Berman

June 27, 2025

The Honorable Richard M. Berman
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312Re: Copenhagen v. DDC Enterprises Limited, et al. SDNY Case No. 1:25-cv-02708-RMB
Proposed Stipulation and Request to Vacate the Pre-Motion Conference

Dear Judge Berman:

We represent Defendants DDC Enterprises Limited, DDC US Inc. and Yai's Thai, Inc. in the above-referenced civil action. We write on behalf of all parties, pursuant to Rule 1(A) of the Court's Individual Practices, to request that the pre-motion conference currently scheduled for July 9, 2025 be vacated in favor of a stipulated schedule providing for deadlines for Plaintiff's filing of an amended pleading and Defendants' response thereto.

On June 6, 2025, the DDC Defendants filed a letter seeking a pre-motion conference in advance of a contemplated motion to dismiss. [ECF #14]. On June 11, 2025 Plaintiff filed a letter in response thereto stating Plaintiff's intent to amend the original Complaint to clarify certain allegations and potentially add new claims. [ECF #16]. In light of these filings, counsel for the parties have conferred and respectfully submit that in the interests of judicial efficiency, the July 9, 2025 pre-motion conference should be vacated in favor of the following stipulated schedule for Plaintiff's filing of an amended pleading and Defendants' response thereto:

- Plaintiff to file a First Amended Complaint on or before July 11, 2025; and
 - Defendants to answer, ^{OR} move, ^{against} ~~or otherwise respond to~~ the First Amended Complaint, ^{RMB} ~~including by filing any necessary pre-motion conference request, by July 20, 2025.~~ ^{RMB}
 - ^{RMB} ~~Page limits apply to motions as set forth in the Court's rules.~~
- Accordingly, the parties respectfully request that the July 9, 2025 pre-motion conference be vacated and the foregoing stipulated schedule be "so Ordered" by the Court.

Respectfully submitted,

John Piskora
Partner

cc: All Counsel of Record (via ECF)

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